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Mr. William Avey  
Forest Supervisor  
Helena National Forest  
via email to [appeals-northern-regional-office@fs.fed.us](mailto:appeals-northern-regional-office@fs.fed.us)

Re: Helena National Forest, Blackfoot Travel Plan FEIS Draft Decision

Dear Mr. Avey:

I appreciate the opportunity to object to one item of your Draft Decision. I write as an individual who submitted comments on the Draft EIS. The Final Environmental Impact Statement added Alternative 4, one not included in the Draft EIS, and the Draft Decision selected Alternative 4. Since my objection applies to an item included in Alternative 4, my objection meets the requirements of 36 CFR 218.8(d). I am a section hiker of the Continental Divide National Scenic Trail; a trail maintainer who has volunteered over 6 months on national scenic trails; a citizen, thus a shareholder, in our national patrimony including Helena National Forest; and a grandfather who wants his grandchildren to have the same opportunities for high quality, scenic, primitive hiking on this section of the CDNST that I enjoyed in 2012.

I have read the FEIS and your Draft Decision. Overall, I agree with your reasoning that strikes a balance among various uses of the national forest. However, I object to the portion of the decision that would open the entire CDNST on the area of Helena National Forest covered by the Blackfoot Travel Plan to mountain bike use. Below are my concerns.

1. User Conflict between Mountain Bike riders and Hikers or Horsemen. I am concerned about the potential for user conflict of the CDNST section running through the area of the Blackfoot Travel Plan. As I learned in hiking the CDNST in Colorado during the summer of 2013, there is a potential for conflict between mountain bikers and hikers or horsemen. I was startled numerous times when mountain bikers overtook me on the trail without so much as a "Hello" or the sound of a bell or other means of alerting me of their approach. I met horsemen whose horses were startled by mountain bikers. In Colorado some of these encounters were inconsistent with the nature and purpose of the CDNST. While the current level of mountain bike use on the trails in the Blackfoot Travel Plan area may be very low making the likelihood of such conflicts minimal, even non-existent, I am concerned that "once the bicycle genie is out of the bottle, you or your successor will be unable or unwilling to put it back."

2. Tread Erosion. What level of mountain bike use will cause tread erosion to the extent that a hiker can no longer reasonably be expected to walk on the trail tread? The increase in tread erosion in the section between Monarch Pass and Marshall Pass near Salida, CO on the CDNST between 2010 and 2013 was extraordinary. True this area has a high volume of mountain bike traffic and that the soil types in Colorado and Montana may differ somewhat. However, I also found the trail tread much more eroded elsewhere, often into a V-shape requiring hikers to walk beside, rather than on, the tread in areas where bikes are permitted adjacent to Federal Wilderness Areas while the tread in the adjacent wilderness areas was fine.

3. Lack of a Monitoring Plan with Action Triggers. You dismiss comments to the DEIS that suggest allowing mountain bikes is not consistent with the nature and purpose of the CDNST by

referring to Forest Service policy, "According to Forest Service policy, mountain bikes may be allowed on the CDNST as long as their use does not substantially interfere with the nature and purposes of the CDNST (FSM 2353.42)." That statement is true as far as it goes, but it omits the context in which regulations published in the Forest Service Manual made it. I found the relevant FSM pages in a Word document via a Google search for "FSM 2353.42". They are entitled "CDNST Amendment Sections", are dated November 4, 2009, and are valid until superseded or removed.

Your rational goes on to say, " Most of the CDNST within the planning area currently receives light mountain bike use. Should the popularity of the trail increase significantly among mountain bike users, it may be necessary to adjust management of the trail in the future so that hikers and horseback riders are provided a high-quality recreational opportunity without excessive numbers of bicyclists." I must object that the last statement is very vague and in conflict with the FSM sections covering the management of the CDNST. At what point does increased mountain bike use trigger management action? How will you be measuring mountain bike use and evaluate whether or not it impacts the nature and purpose of the CDNST? Does the CDNST in the area covered by the Blackfoot travel plan area meet construction standards for mountain bike use?

FSM2353.42 declares as "Policy", "The nature and purposes of the CDNST are to provide for high-quality scenic, primitive hiking and horseback riding opportunities and to conserve natural, historic, and cultural resources along the CDNST corridor." There is no reference to mountain bikes, trail motorcycles, or ATVs in this "Policy".

Under the management section (FSM2353.44b, paragraph 8), the manual affirms the following activities as being compatible with the nature and purpose of the CDNST: "Backpacking, nature walking, day hiking, horseback riding, nature photography, mountain climbing, cross-country skiing, and snowshoeing." Paragraph 10 of that section states: "Bicycle use may be allowed on the CDNST ..., *using the appropriate trail design standards, if the use is consistent with the applicable CDNST unit plan* and will not substantially interfere with the nature and purposes of the CDNST"(emphasis mine). The FSM also requires that the Unit Plan "Establish[es] a monitoring program to evaluate the condition of the CDNST...", FSM2353.44b.

Based on the above, I'd conclude that you must exclude mountain bikes from the CDT until you have in place a Unit Plan and a Monitoring Program and until you can affirm that the trail is designed to standards appropriate for bicycle use. Perhaps there is a unit plan and monitoring program, and the Forest Service has certified that these sections of the CDNST do meet the appropriate design standards for bicycle use. If so, may I have a copy?

In conclusion, I formally object to the portion of your decision that permits bicycle use of the CDNST within the area covered by the Blackfoot Travel Plan unless and until Lincoln Ranger District of Helena National Forest: 1)puts in place a Unit Plan, 2) defines a monitoring program with specific triggers that will determine whether mountain bike use conflicts with "high-quality scenic, primitive hiking and horseback riding opportunities"; 3) predefines conditions that will trigger a closure to bicycles should such a conflict arise; and 4)assures that the trail meets "appropriate trail design standards" for bicycle traffic.

Thank you for the opportunity to comment. I look forward to your response.

Sincerely,

Richard Ostheimer

cc: Teresa Martinez, Continental Divide Trail Coalition